

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IDA TUCKER, Plaintiff,)	
)	
)	Case No.: 07 C 6449
)	
v.)	Judge: Andersen
)	
WHELAN SECURITY OF ILLINOIS, INC.,)	Magistrate Judge: Keys
and WHELAN SECURITY COMPANY, and)	
FRED ROGERS,)	
Defendants.)	

**PLAINTIFF'S MOTION FOR LEAVE TO FILE HER
FIRST AMENDED COMPLAINT INSTANTER**

NOW COMES Plaintiff, by the undersigned attorney, requesting that the Honorable Court grant her motion for leave to file her first amended complaint instanter pursuant to Federal Rule of Civil Procedure 15(a)(2). In support of said motion, Plaintiff states as follows:

1. That on November 14, 2007, Plaintiff filed her Complaint naming WHELAN SECURITY OF ILLINOIS, INC., WHELAN SECURITY COMPANY, and FRED ROGERS as defendants alleging violations of Title VII of the Civil Rights Act, 42 U.S.C. section 2000e, as amended and intentional infliction of emotional distress.

2. That Defendants, WHELAN SECURITY OF ILLINOIS, INC., AND WHELAN SECURITY COMPANY, filed their answer to Plaintiff's Complaint on January 4,

2008.

3. That Plaintiff's first amended complaint has corrected typographical errors found in paragraphs 15, 22, 25, 37, 66, and 67 of Plaintiff's Complaint.
4. That Plaintiff has also since learned the correct spellings of certain names of Defendants' employees through Defendants' Answer.
5. That in paragraph 15, Plaintiff's first amended complaint removes the word "the" before "Title VII."
6. That in paragraph 22, Plaintiff's first amended complaint changes "He responded, 'Yeah, I better go.' and walked away" to "He responded, 'Yeah, I better go,' and walked away."
7. That in paragraph 25, Plaintiff's first amended complaint changes "SELDON" to "SELDIN."
8. That in paragraph 37, Plaintiff's first amended complaint changes "TISCANO" to "TOSCANO."
9. That in paragraphs 66 and 67, Plaintiff's first amended complaint changes "R & O" to "WHELAN SECURITY."

10. That Plaintiff has attached hereto her first amended complaint.
11. That Plaintiff's first amended complaint is not being submitted for any improper purpose. Instead, through the amended complaint, Plaintiff seeks to correct typographical errors.
12. That said changes do not affect the substance of the complaint except to correct said typographical errors.

WHEREFORE, Plaintiff requests that this Honorable Court grant her motion for leave to file her first amended complaint instanter and grant such further relief as this Court deems appropriate.

Respectfully Submitted,
Ida Tucker,

By: s/ Uche O. Asonye
One of Her Attorneys

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Mark Pando - 6283683
Scott Fanning - 6292790
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11 South LaSalle Street, Suite 2140
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 11th day of January 2008, I served a true and accurate copy of the foregoing Plaintiff's Motion For Leave to File Her First Amended Complaint Instantly upon the following by electronically filing it with the Clerk of the Court by using the CM/ECF system, which will send notification of such filing to the following:

Alisa B. Arnoff, Esq.
Scalambrino & Arnoff, LLP
1 North LaSalle Street, Suite 1600
Chicago, Illinois 60602

Respectfully Submitted,
Ida Tucker,

By: s/ Uche O. Asonye
One of Her Attorneys

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